



## Privacy Policy

*Please read this document in addition to the Terms and Conditions where you can see the definitions for some terms used also in this document. If you want to purchase or test our items, you share with us some information, personal data, and browsing our site you must agree to our policy on the use of cookies and similar technologies.*

*This document does not replace any other specific notifications/requests, when needed, regarding the processing of personal data.*

## Processing of Personal Data. Cookies Policy

We are **VESTINDA SRL**, with the identification data presented in the Terms and Conditions section with the **site** owned by us [www.vestinda.com](http://www.vestinda.com) and the **application** <https://app.vestinda.com/> through which we provide users with information and items for purchase ("**Site**" or the "**App**"). Media pages that belong to us (called "Platform" within our Terms and Conditions) are the following, but not limited to:

<https://www.facebook.com/Vestinda>  
<https://www.instagram.com/Vestinda/>  
<https://www.linkedin.com/company/vestinda/>  
<https://twitter.com/vestinda>

**Please contact us at email** [contact@vestinda.com](mailto:contact@vestinda.com) to check the authenticity of the pages and the fact that they are owned by us if any doubts about the ownership.

We are NOT responsible for the information and personal data you might communicate to false accounts or pages which have similarities with ours or any other pages than those held by us.

In this document we will refer to us under the name of "Organization", "Firm" or "Company".

We, The Company, as a *personal data controller* in our relationship with you, having the status of *data subjects*, meaning individuals / the representative / the contact person of a company / any person in a relationship of any kind with our Company, make every effort to process your

personal data in full compliance with **Regulation (EU) 2016/679** (“General Data Protection Regulation” or “**GDPR**”), as well as with the applicable legislation in Romania, as a company legally registered in Romania.

**VESTINDA SRL** implements adequate technical and organizational measures in order to ensure a high level of security and protection of personal data. We use security methods and technologies, together with internal policies and working procedures, to protect personal data collected in accordance with applicable law.

We are NOT required by law to designate a Data Protection Officer (“DPO”).

You can contact us at any time at the contact address - for any questions, notifications or complaints regarding the collection, or processing of your personal data - **email contact@vestinda.com**

### **Collected Personal data**

- **Identification data** - name, surname, company name, unique identification code, registration number at the trade register, online identifier / username, account password, IP address, login details of the device from which you access us and any technologies involved, Internet provider, date and duration of the visit, *cookies*.\*
- **Contact details** - e-mail, telephone, delivery address, billing address
- **Biometric data** - facial images / images which allow facial recognition - e.g. uploaded as profile picture
- **Financial data** - data regarding the card or bank account

Special (sensitive) personal data, as defined by the GDPR, are racial data, ethnic data, data regarding political opinion, biometric data, genetic data, data regarding religion or philosophical belief or trade union beliefs, health data, sex life data or sexual orientation data. We do NOT collect such special Personal Data.

### Ways (means) of collecting personal data

In order to be able to **effectively sell** our items to you or to **make available the App for you in order to test it**, you have to directly provide us with the necessary personal data (**express consent**), and within an ordering procedure/creating an account on the App we will mark some

fields as **mandatory**. We reserve the right not to respond to messages / requests on the contact address if we cannot verify your identity.

We collect your Personal Data directly from you, in certain circumstances, including when you voluntarily communicate to us, for any reason, your Personal Data.

At the same time, some personal data reaches us **automatically**, through online technologies, through the use of cookies\*, logs and other similar technologies, or provided by third parties - such as Google Analytics

(here you can find their terms: <https://support.google.com/analytics/answer/6004245?hl=en>),

Facebook and others (eg. you tag us, share, write us a comment or message) and by using our Site / App / placing orders you expressly agree to such indirect processing.

We use personal data only for the purposes for which we collected it, unless it is reasonably necessary to use it for another purpose, compatible with the original purpose.

It is possible to process personal data without the need for express consent, where the law allows us.

**In order to subscribe to our newsletter, we will also expressly request your personal data and express consent.**

## Purpose of processing

- to conclude / execute the contract (this includes creating an user online account, re-verifying your identity when you return to the site, providing data to third parties for invoice operations, delivering the items you have ordered, online payment management,
- to achieve our legitimate interest without affecting your fundamental freedoms (eg to answer your questions / for marketing purposes with your express consent - this includes your previous share / tag, to improve our services, to remedy technical problems, to personalize our offer according to our audience, to evaluate the Company by due diligence, for the unlikely situation in which we sell our business and therefore entire goodwill it will be transferred, to answer a request / question / complaint),
- to comply with a legal (e.g.: to the prosecutor's office, the police, courts and other competent state bodies, as a result of express requests) or statutory obligation, to claim a right in court,
- to inform you about promotional offers, events or other information about us, when we have your express consent to it (eg.: newsletter subscription).

You will be able to unsubscribe from the newsletter at any time through the instructions provided in each communication or through an express request to the e-mail address above.

You can set your browser to not accept cookies (partial / total) or to warn you when accessing cookies. In such a case, please note that certain parts of the Site/App may no longer be accessible or may not function properly.

We do not transfer personal data to EEA or international third country organizations. The database is backed up in **Ireland**, and the main server is in a cloud service in **Ireland**.

We take into account very seriously the principle of MINIMIZATION OF DATA and therefore the personal data we process are limited only to those necessary, appropriate and relevant for the stated purposes.

At the same time, the access to your personal data is RESTRICTED as much as possible to our legal representatives, employees, collaborators, third parties who need this data to perform a contract.

As the duration of the storage of personal data, we will keep the data for as long as is necessary to fulfill our purposes for which we have collected it, including in order to meet any legal, accounting (eg. 5 years) or reporting requirements.

We take technical measures periodically for the security of the personal data collected but we cannot guarantee for perfect functionality and 100% data integrity as no website / media platform can.

In the unfortunate event of a breach, we will follow exactly the procedure for reporting and notifying security incidents to the ANSPDC (Romanian competent authority) and we will take all necessary measures to limit the spread of the effects as soon as possible.

#### AS OUR CLIENTS YOU HAVE THE FOLLOWING RIGHTS UNDER GDPR

- **The right to access your own personal data** - The Customer ("data subject" within the meaning of GDPR) has the right to obtain confirmation that we process his/her personal data and to have access to that data (including by providing copies of extras).

- **The right to rectification of personal data** - The Customer has the right to request and obtain the rectification, updating or completion of his personal data inaccurate or incomplete.
- **The right to delete data** - The Customer has the right to request us the deletion of his Personal Data, for the following reasons:
  - ✓ Personal data have not been deleted and are no longer necessary for the purposes for which they were collected or processed;
  - ✓ Personal data have been processed illegally;
  - ✓ The client exercises his right to object and there are no legitimate reasons to prevail.
- **The right to restrict the processing** - The Customer has the right to request and obtain the restriction of the processing of personal data, in the following cases:
  - ✓ The customer disputes the accuracy of the data, in which case the restriction will be made for a period that would allow VESTINDA SRL to verify the accuracy of that data;
  - ✓ when the processing is illegal and the Customer opposes the deletion of the Data, requesting in return the restriction of their use;
  - ✓ when VESTINDA SRL no longer needs the Personal Data for the purpose of Processing, but the Customer requests the Personal Data for the establishment, exercise or defense of a right in court;
  - ✓ when the Customer has objected to the processing by virtue of the right to object, in which case the restriction will be made for the period in which it is verified whether the legitimate rights of VESTINDA SRL prevails over those of the data subject.
- **The right to data portability** - The Customer has the right to receive Personal Data concerning him and which are processed by electronic means, with the right to transmit them to another Operator, when: the processing is performed by automatic means.
- **Right to object** - The Customer has the right to oppose, for reasons related to the particular situation in which it finds itself, the Processing carried out in the legitimate interest of VESTINDA SRL or processing for direct marketing purposes, including profiling.
- **The right to complain to ANSPDCP**, B-dul G-ral. Gheorghe Magheru no. 28-30, Sector 1, postal code 010336, Bucharest, Romania, [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro).

To exercise the rights listed please use the email address provided above. We will try to respond to your request **within 30 days**. However, the deadline may be extended on a case-by-case basis.

## COPYRIGHT

The content of our Site is protected by copyright laws. All materials contained on this Site are protected by copyright laws and may not be reproduced, distributed, transmitted or published without our express written consent. The site is the property of **VESTINDA SRL**. **Users may copy texts and use them for non-commercial purposes, with the obligation to indicate the Site /**

**specific link.** Users undertake not to copy text, portions of text or graphics for commercial use. It is strictly forbidden to use this Site for the purpose of destroying, interrupting or altering its content or security, or to discredit / harass the members of the Company, collaborators / customers and / or the items.

*\*Specific information about COOKIES*

**Our site provides a pop-in box on first access from a device, requesting your consent to accept cookies and agree to the cookie policy.**

We use the term "cookies" to refer to cookies and similar technologies through which information can be collected automatically.

Cookies are small files, consisting of letters and numbers, which are stored on a user's computer, mobile terminal or other equipment through which the Site is accessed.

A visit to any of our Sites/Apps mentioned above may place the following types of cookies:

1. **cookies strictly necessary** for the operation of the site
2. **analysis cookies** (user behavior)
3. **cookies for advertising/media**

## **COOKIE SETTINGS**

Cookies that are absolutely necessary, also called "**strictly necessary**" **(1)**, provide functions without which you can not use the web page you are accessing correctly. These cookies are used exclusively by us and are the so-called First Party Cookies. They are only stored for the current browser session on your computers. Cookies that are absolutely necessary: For the login function we have a "Session-Cookie". Without this cookie it is not possible to connect and the functions behind the connection do not work.

In addition, cookies of this type ensure, for example, when changing the page from http to https the functionality of the page and compliance with security requirements regarding data transfer. Your consent is not required to use the required cookies.

Cookies that are absolutely necessary cannot be deactivated using the function of this page. However, they can be deactivated at any time using the browser used.

First Party Cookies that require your consent, "**analysis cookies**" **(2)** are Cookie files that, according to the legal definition, are not necessarily necessary to use the website, but which perform important tasks. Without these cookies, functions that ensure a convenient navigation on our website, such as, for example, pre-filled forms, would no longer be available. Settings made, such as language selection, cannot be saved and must be reset on each page.

Third-Party Cookies that require your consent are third-party content, "**advertising cookies/media**" **(3)**. Third-party providers / social media platforms may theoretically place cookies, and may obtain information about your access to one of our web pages. Please access the web pages of third party providers to obtain information on their use of cookies.

Most of the cookies we use are so-called "session cookies", which are automatically deleted after you leave our site. Other cookies allow us to recognize your browser on the next visit. They remain stored on your device until you decide to delete them.

#### *CHANGES TO THIS DOCUMENT*

We may change this document at certain intervals. Therefore, we recommend that you access this page and read the latest version each time you access / place your order.

*Last edit: 01.09.2022*